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(full counsel information on signature page)

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

TARA BOWMAN,

a consumer residing in
Oregon, individually and
on behalf of all others
similarly situated,

Plaintiff,

v.

**TODD, BREMER &
LAWSON, INC.,**

a foreign debt collector for
Portland State University,

Defendant.

Case No. 3:17-cv-1092

**CLASS ACTION
ALLEGATION COMPLAINT**

15 U.S.C. § 1692k

Demand for Jury Trial

1.

INTRODUCTION

Laws protecting borrowers from excessive debt collection date back to America's Founding Fathers. The Constitution, Article 1, Section 8 instructed Congress to enact "uniform Laws on the subject of Bankruptcies throughout the United States." Almost 75 years after the Constitution was ratified, Congress passed the 13th Amendment, prohibiting all forms of indentured servitude. Another 100 years later, the United States Supreme Court began declaring debtors' prisons unconstitutional. In 1977, Congress passed the Fair Debt Collection Practices Act to protect borrowers from unfair and excessive collection fees. Oregon law specifically protects former students from unreasonable fees on debts owed to public universities.

But not all collectors choose to follow the law.

2.

While attending PSU in the fall of 2014, Tara Bowman incurred various charges to her PSU account including tuition, health insurance, housing costs, and membership dues. On top of these charges, PSU also added various fees to her account, including a "mandatory fee", a "matriculation fee", a housing lease break fee, library fines, billing and maintenance fees, late payment fees, and a "collection processing fee". Then PSU began adding accrued interest on all these charges.

3.

When Tara Bowman became unable to pay all of PSU's charges and fees upon demand, PSU declared her account delinquent and assigned it to its South Carolina debt collector, Todd, Bremer & Lawson, Inc. (TBL Inc.) for collections. To add insult to injury, TBL Inc. then automatically demanded Tara Bowman pay an additional 25% "agency fee" (totaling almost \$4,000) on top of all of the other charges, fees, dues and interest, massively ballooning Tara Bowman's debt to PSU to an amount she remained unable to afford. As far as Tara Bowman can tell, TBL Inc. did nothing more than mail a computer-generated collection letter to "earn" the 25% agency fee it now demands that she pay. As of the date of this complaint, TBL Inc.'s agency fee continues to grow because TBL Inc. calculates the fee as 25% of the "principal" balance and interest which continues to accrue.

4.

Thankfully, this type of excessive, automatic percentage-based fee is prohibited by Oregon law because it is unreasonable and because is not used to compensate PSU for any amounts that PSU actually incurred or will incur. The excessive fee TBL Inc. attempts to charge Tara Bowman (and potentially thousands of other former PSU students) is nothing more than an unenforceable liquidated damages penalty. Although violations of Oregon's collection agency laws cannot be

privately enforced, the overstatement and collection of amounts not allowed by law also violate the federal Fair Debt Collection Practices Act, which regulates the behavior of debt collectors like TBL Inc.

Tara Bowman files this federal class action complaint on behalf of herself and potentially thousands of former PSU students. She files this case in hopes of stopping TBL Inc. from continuing to demand excessive, unlawful collection fees from former PSU students. She also hopes to force TBL Inc. to return potentially hundreds of thousands of dollars in excessive fees that it has unlawfully collected from former PSU students over the past year.

5.

JURISDICTION AND THE PARTIES

This Court has jurisdiction under 28 U.S.C. § 1331 because the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692, *et seq.*, is a federal consumer protection law.

6.

Plaintiff Tara Bowman is an individual living in Washington County, Oregon and a “consumer” protected by the FDCPA because she allegedly owes delinquent debt to Portland State University (PSU), incurred for personal tuition, services, and goods provided to her by PSU (the “debt”).

7.

Todd, Bremer & Lawson, Inc. (TBL Inc.) is a South Carolina corporation that collects tuition and student loan debts nationwide, and on behalf of PSU from consumers in Oregon.

8.

TBL Inc.'s principal place of business is located at 560 S Herlong Avenue, Rock Hill, South Carolina 29732, and its registered agent service address listed with the Oregon Secretary of State is Cogency Global, Inc., 325 13th Street NE, Suite 404, Salem, Oregon 97301.

9.

TBL Inc. is a "debt collector" as that term is defined in the FDCPA because it regularly collects and attempts to collect consumer debts owed to, and on behalf of, other creditors, such as PSU, using mail, electronic bank transfers, and the Internet, and the principal purpose of TBL Inc.'s business is the collection of delinquent debts owed to original creditors such as PSU.

10.

TBL Inc. is licensed with the Oregon Division of Financial Regulation as a debt collection agency – license number 49365.

11.

Venue is proper under 28 U.S.C. § 1391 because TBL Inc. attempted to collect debt from Tara Bowman when she resided in Washington County, Oregon.

12.

FACTUAL ALLEGATIONS

This complaint's allegations are based on personal knowledge as to Tara Bowman's conduct, and made on information and belief as to the acts of others.

13.

The debt at issue arose in 2014, when Tara Bowman allegedly agreed to pay PSU for tuition, memberships, services, and associated fees, interest, and other charges.

14.

The debt was not a government-affiliated or government-guaranteed student loan, or a loan at all, but rather an alleged obligation to pay PSU various charges and fees.

15.

TBL Inc. sent an initial collection letter dated July 18, 2016 (the "collection letter") to Tara Bowman. A true and correct redacted copy of the collection letter is attached as **Exhibit 1**.

16.

The collection letter was composed by and sent and caused to be sent by persons employed by, or an agent of, TBL Inc.

17.

The collection letter was a communication by a debt collector in an attempt to collect Tara Bowman's alleged debt owed to PSU.

18.

The collection letter was addressed to Tara Bowman at her address in Washington County, Oregon.

19.

Tara Bowman received the collection letter sometime before the end of July 2016.

20.

The collection letter stated that "Portland State University Accounts Receivable" was the current creditor, "[t]his account has been listed with our office for collection," and "[t]his communication is from a debt collector. This is an attempt collect a debt and any information obtained will be used for that purpose."

21.

The collection letter requested payment as follows:

Principal	\$13,147.00
Fees	\$3,775.72
Additional Interest & Fees	\$4.32
Interest	\$1,951.55
Late Charge	\$0.00
Client Cost	\$0.00
Total Amount Due	\$18,878.59

22.

The undefined \$3,775.72 “Fees” in the collection letter reflects 25% of \$15,102.87, which is the sum of the \$13,147.00 “Principal” plus the \$4.32 “Additional Interest & Fees” and the \$1,951.55 “Interest”.

23.

TBL Inc. sent Tara Bowman a second collection letter dated February 9, 2017 (the “second collection letter”). She received the second collection letter sometime in mid-February 2017. The second collection letter simply demanded payment of \$20,110.44, but did not break down the total amount owed into any specific charges, fees, or interest. A true and correct redacted copy of the second collection letter is attached as **Exhibit 3**.

24.

Shocked and concerned by the amount of excessive “fees” that had ballooned her alleged debt owed to PSU, Tara Bowman contacted PSU to request more information and clarification because she did not feel

safe contacting TBL Inc. directly. PSU initially told her that she needed to call TBL Inc. and request information from it. PSU eventually relented and stated that it would send her request along to TBL Inc.

25.

In response to her request, Tara Bowman received an itemized statement containing a PSU logo “Prepar[ed] March 3, 2017” (the “itemized statement”) in early March 2017. A true and correct redacted copy of the itemized statement is attached as **Exhibit 2**.

26.

The itemized statement lists amounts for tuition, membership, various services, fines, penalties, late fees, a “Collection Processing Fee” of \$75 and “Interest on principle [sic] balance” of \$2,992.51.” On a separate page, the itemized statement also listed an “Agency Fee” due to TBL Inc. of \$4,034.88 for a total “PAYOFF DUE TO” TBL Inc. of \$20,174.39.

27.

Just as in the collection letter, the \$4,034.88 “Agency Fee” demanded by TBL Inc. in the itemized statement reflects 25% of \$16,139.51, which is the sum of the \$13,147.00 principal and the \$2,992.51 interest accrued to the date.

28.

The first collection letter, second collection letter, and itemized statement together indicate that TBL Inc. is adding on an automatic 25% fee to the “Principal” and the “Interest”, an amount that increases as the interest continues to accrue. TBL Inc.’s “Agency Fee” is not based on any actual time spent or expense incurred by TBL Inc. or by PSU in an effort to collect the debt.

29.

ORS 697.105(1) provides:

(1) Except as provided in ORS 1.202 and 293.231, if a public body, as defined in ORS 174.109, uses a private collection agency to collect a debt owed to the **public body**, the public body may add a **reasonable fee** to the amount of the debt, payable by the debtor, **to compensate the public body, in whole or in part, for the collection agency fee incurred or to be incurred.**

(Emphases added).

30.

TBL Inc. is a “collection agency” under ORS 697.005(1)(a)(A).

31.

PSU is a “public body” under ORS 174.109, ORS 174.117(1)(i), and ORS 352.002(3).

32.

The automatic 25% “Fees” for \$3,775.72 and “Agency Fees” for \$4,034.88, that were added to the total amounts demanded by TBL Inc.

in the collection letter and the itemized statement, and as an undefined amount in the second collection letter, are not reasonable fees that TBL Inc. can collect under ORS 697.105 because the amounts are not reasonably proportional to, or based on, any time spent, services provided, or expenses incurred by TBL Inc. to send one, or several, collection letters.

33.

The automatic 25% “Fees” for \$3,775.72 and “Agency Fees” for \$4,034.88, that were added to the total amounts demanded by TBL Inc. in the collection letter and the itemized statement, and as an undefined amount in the second collection letter, are not allowed because these amounts were not to compensate PSU for a collection agency fee that was actually incurred, or that will ever actually be incurred, by PSU.

34.

Any contract term that purports to allow PSU or TBL Inc. to charge a fee calculated as percentage of the principal and interest accruing on a debt simply because Tara Bowman failed to pay the debt on time is also prohibited by Oregon law as an unenforceable liquidated damages clause. The percentage-based fee bears no reasonable relationship to any anticipated damages that will be incurred to remedy a breach, and is a disproportionate penalty. Thus, TBL Inc. was prohibited from charging its “Agency Fee” under Oregon law.

35.

The collection letter, second collection letter, and itemized statement were communications and a means to attempt to collect the debt from Tara Bowman.

36.

TBL Inc. is not allowed to collect or attempt to collect fees that are prohibited by Oregon law or federal law, regardless of what any contract with PSU and Tara Bowman may provide.

37.

The collection letter, the second collection letter, and the itemized statement are false, deceptive, and misleading representations and means to collect or attempt to collect the debt and an unfair and unconscionable means to collect or attempt to collect the debt because the collection fees TBL Inc. was attempting to collect from Tara Bowman for its own benefit were prohibited by Oregon law. The fees were unreasonable, were not to compensate PSU for collection agency fees that were, or would be, actually incurred by PSU, and represent an unenforceable liquidated damages penalty.

38.

By adopting the FDCPA, Congress elevated the right of a consumer such as Tara Bowman to be free from a debt collector's unlawful collection practices. The invasion of that right by TBL Inc. is a

concrete injury in fact for which this Court may provide relief. TBL Inc.'s false, deceptive, and misleading statements and unfair and unconscionable tactics to collect amounts that are not allowed by law presented an actual material risk of harm – including that as a result of TBL Inc.'s violation of the law as set forth in this complaint, Tara Bowman would pay amounts that TBL Inc. was not entitled to collect.

39.

Given the nature of the percentage-based fee that TBL Inc. added to the sum of “principal” balance and the interest and attempted to collect in the collection letter, second collection letter, and itemized statement, Tara Bowman believes that, given the opportunity for discovery, the evidence will show that TBL Inc.'s collections of amounts prohibited by Oregon law and in violation of the FDCPA as alleged in this complaint represent a common collection scheme. As part of its collection scheme, TBL Inc. sends materially similar collection letters to potentially thousands of other Oregon consumers to collect, or attempt to collect, materially similar percentage-based fees in amounts that are prohibited by Oregon law, and that overstate the debt amount in violation of the FDCPA. Upon information and belief, the evidence will show that PSU is not obligated to pay anything to TBL Inc. if an account is deemed uncollectable or if TBL Inc. does not recover any payments from the account holder before relinquishing the account back to PSU.

40.

CLASS ACTION ALLEGATIONS

Under FRCP 23, Tara Bowman brings this action on behalf of herself and all other similarly situated individual consumers. The class is initially defined as:

- a) all individual consumers with Oregon addresses,
- b) who TBL Inc. sent, in an attempt to collect debt allegedly owed to PSU, a letter,
- c) which included an amount for TBL Inc.'s collection fees calculated as an automatic percentage of the total principal balance and interest on the debt, or
- d) that included an amount for TBL Inc.'s collection fees that was not used to compensate PSU for actual amounts incurred or actually to be incurred by PSU, and
- e) such letter was sent on or after a date one year prior to the filing of this action.

41.

A class action is proper under FRCP 23(a) because upon information and belief based on the yearly enrollment numbers for PSU, the class consists of potentially thousands of individual consumers, and joinder of all members is impracticable. Each class member is easily

identifiable based on TBL Inc.'s and PSU's account records. Excluded from the class are all attorneys for the class, officers and directors of TBL Inc., including officers and directors of any entity with an ownership interest in TBL Inc., any judge who sits on the case, and all jurors and alternate jurors who sit on the case.

42.

This action can be maintained as a class action under FRCP 23(a) and (b) because there are questions of law and fact common to the class members, which predominate over any questions relating to individual class members, including but not limited to:

- a) Whether letters sent by TBL Inc. attempting to collect a fee calculated as an automatic percentage of the principal balance and the applicable interest rate, that increases along with the interest accrual, is an unreasonable fee prohibited by ORS 697.105, thus violating the FDCPA,
- b) Whether TBL Inc.'s collection fees were ever used to compensate PSU for collection agency fees that were actually incurred, or will ever be incurred, by PSU, and if not, whether these fees are prohibited by ORS 697.105, thus violating the FDCPA,
- c) Whether letters sent by TBL Inc. attempting to collect automatic percentage-based collection fees are an unenforceable liquidated

damages penalty prohibited by Oregon law, thus violating the FDCPA.

43.

Tara Bowman's claim is typical of the claims of the class members, as it is based on the same factual circumstances, form letters, common collection scheme, and legal theories. Tara Bowman has no interests adverse to the class members.

44.

Tara Bowman will fairly and adequately represent and protect the interests of the members of the class. Tara Bowman has retained nationally known and locally respected counsel experienced in class action litigation and FDCPA litigation to further ensure such representation and protection of the class. Tara Bowman and her counsel intend to prosecute this action vigorously and have the resources necessary to successfully try this case to judgment.

45.

A class action is superior to other available methods for the fair and efficient adjudication of this controversy. Absent class-wide adjudication, members of the class are without effective recourse. Because of the relatively small monetary value of each individual class member's claim, few, if any, class members could afford to prosecute an individual action against TBL Inc. The federal court filing fee alone is

almost half of the maximum statutory damages available under the FDCPA. Absent class treatment, TBL Inc.'s alleged wrongdoing would go unabated, and no class member would be afforded the opportunity to seek judicial relief, whether for themselves or for the public good generally.

46.

A class action is appropriate under FRCP 23(b)(3) because the questions of law and fact regarding the nature and legality of TBL Inc.'s practices as alleged above predominate over any questions affecting only individual class members, and a class action is superior to other available methods for the fair and efficient adjudication of this controversy, for the following reasons:

- a) The prosecution of separate actions creates a risk of inconsistent or varying rulings,
- b) The common questions of law and fact described above predominate over questions affecting only individual members,
- c) Individual class members would have little interest in controlling the prosecution of separate actions because the amount of each individual claim is relatively small compared to the complexities of the issues and the expenses of litigation,
- d) This is a desirable forum because this Court has significant experience managing class actions under the FDCPA,

- e) A class action will be an efficient method of adjudicating the claims of the class members, and
- f) Class members have claims that are not significant in amount relative to the expense of the litigation, so separate actions would not afford significant relief to the members of the class.

47.

CLAIM FOR RELIEF

(15 U.S.C. § 1692k)

Adding an automatic 25% collection fee onto a principal debt and an increasing interest amount always represents an unreasonable collection agency fee because it is completely divorced from any actual time spent or expense incurred by TBL Inc. in generating and sending a form collection letter, or two or three. A consumer that owed a principal and accrued interest amount totaling \$20,000 would automatically be charged \$5,000 in fees, whereas a consumer who owed a principal and accrued interest amount totaling \$1,000 would only be charged \$250, although the time spent and any expense incurred by TBL Inc. would be the same. Thus, the collection of such fees is prohibited by Oregon law.

48.

Additionally, adding an automatic 25% collection fee onto a principal debt and an increasing interest amount is an unenforceable liquidated damages penalty that bears no reasonable relationship to anticipated damages that would be difficult to precisely ascertain, is a disproportionate penalty. Thus, the collection of such fees is prohibited by Oregon law and in violation of numerous provisions of the FDCPA because TBL Inc. is a debt collector.

49.

TBL Inc.'s choice to send the collection letter attached as **Exhibit 1**, the second collection letter attached **Exhibit 3**, and the itemized statement attached as **Exhibit 2** to Tara Bowman, and materially similar collection letters to members of the putative Oregon class, in an attempt to collect amounts for its collection fees that it was prohibited from collecting under Oregon law and which overstated the debt, is a false, deceptive, and misleading representation and means to collect the debt, a false representation of the amount of the debt, and an unfair and unconscionable means in collection of the debt that is not allowed by law, in violation of 15 U.S.C. § 1692e, § 1692e(2)(A), § 1692e(5), § 1692e(10), § 1692f, and § 1692f(1).

50.

As a result of TBL Inc.'s violation of the FDCPA as alleged above, Tara Bowman and all other similarly situated individual consumers are entitled to actual damages including any amounts paid to TBL Inc. for its unlawful fees under § 1692k(a)(1), statutory damages under § 1692k(a)(2)(B), and reasonable fees and costs under § 1692k(a)(3).

51.

Demand for jury trial.

PRAYER FOR RELIEF

Tara Bowman seeks relief for herself and the proposed class as follows:

- A. An order that this case may proceed as a class action and an order that TBL Inc. violated the FDCPA,
- B. An order and judgment in favor of Tara Bowman and the class against TBL Inc. for damages determined to have been sustained by them, including actual damages, maximum statutory damages, and fees and costs.
- C. An order and judgment in favor of Tara Bowman and the class against TBL Inc. for maximum pre-judgment and post-judgment interest, and
- D. For any other relief this Court may determine is fair and proper.

July 14, 2017

RESPECTFULLY FILED,

s/ Michael Fuller
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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TARA BOWMAN,
a consumer residing in
Oregon, individually and
on behalf of all others
similarly situated,

Case No. 3:17-cv-1092

COVER PAGE

Plaintiff,

v.

**TODD, BREMER &
LAWSON, INC.,**
a foreign debt collector for
Portland State University,

Defendant.

Exhibit 1

COVER PAGE

Todd, Bremer & Lawson, Inc.

July 18, 2016

560 South Herlong Avenue
 Post Office Box 36788
 Rock Hill, South Carolina 29732-0512
 803-323-5205
 877-427-6544

Tara Bowman

Account #
 Access Code:

Creditor: Portland State University Accounts Receivable

This account has been listed with our office for collection.

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, the office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of this debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Principal	\$13,147.00	Late Charge	\$0.00
Fees	\$3,775.72	Client Cost	\$0.00
Additional Interest & Fees	\$4.32		
Interest	\$1,951.55		
		Total Amount Due	\$18,878.59

TODD/002

264007426306

495/0000463/2

PLEASE RETURN THIS PORTION WITH YOUR REMITTANCE

Post Office Box 36788
 Rock Hill, South Carolina 29732-0512
 Return Service Requested

I expressly consent to contact on any wireless number associated with my account via automated telephone dialing systems and/or prerecorded or artificial voice messages. There is a \$25.00 charge for returned checks.

If you wish to pay online, please visit www.tblpaynow.com and click "I Agree".

Access Code:
 Account #:

Payment: \$ _____
 Phone: (____) _____ - _____ Home () Cell () Work ()



Tara Bowman

Portland, OR 97229-5425



Todd, Bremer & Lawson, Inc.
 P.O. Box 36788
 Rock Hill, SC 29732-0512

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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TARA BOWMAN,
a consumer residing in
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Case No. 3:17-cv-1092

COVER PAGE

Plaintiff,

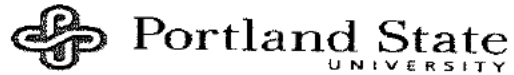
v.

**TODD, BREMER &
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a foreign debt collector for
Portland State University,

Defendant.

Exhibit 2

COVER PAGE



Business Affairs | Office of the Bursar

Post Office Box 202 503-725-3440 tel

Portland, Oregon 97207-0202 503-725-5458 fax

Tara Marie Bowman

ITEMIZED STATEMENT

UG NONRES TUITION - FALL 2014	\$ 7,840.00
MANDATORY FEES - FALL 2014	\$ 298.00
MATRICULATION FEE -	\$ 325.00
STUDENT HEALTH INSURANCE - FALL 2014	\$ 694.00
CAMPUS HOUSING/DORM -	\$ 2,549.00
HOUSING CONTRACT/LEASE RELEASE	\$ 427.00
HEALTH SERVICE FEE - FALL 2014	\$ 25.00
TRANSPORTATION PASS(S)	\$ 75.00
BIKE SHOP RENTAL(S)	\$ 105.00
BIKE SHOP MEMBERSHIP - FALL 2014	\$ 60.00
LIBRARY FINES	\$ 44.00
CONDUCT FEE	\$ 20.00
Late payment penalty(s)	\$ 600.00
Collection Processing fee	\$ 75.00
Billing and Maintenance	\$ 10.00
Interest on principle balance	\$ 2,992.51

Agency Fee due to Todd, Bremer & Lawson

\$ 4,034.88

PAYOFF DUE TO Todd, Bremer & Lawson

\$ 20,174.39 exp.3/15/17

Ph#1-877-427-6544

Prepar March 3, 2017

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Lead Trial Attorney for Tara Bowman
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Defendant.

Exhibit 3

COVER PAGE

Todd, Bremer & Lawson, Inc.

560 South Herlong Avenue
Post Office Box 36788
Rock Hill, South Carolina 29732-0512
Facsimile 803.323.5211
Toll Free 877.427.6544

February 9, 2017

Tara Bowman

Account Number

Access Code

Beaverton OR 97003

Creditor: Portland State University Accounts Receivable

Total Amount Due: \$20110.44

We have not received a reply from our previous letter to satisfy your outstanding balance. To avoid further collection efforts, please make arrangements to pay in full.

You may call our office or if you would like to make payment by mail, please include the bottom portion of this letter with your payment to ensure proper credit to your account. You may also pay online by visiting www.tb1paynow.com and clicking "I Agree" using your access code listed above. You may email us at account.help@tbandl.com and place the words "Account Help" followed by your account number in the subject line. Please know that we will not be able to respond to emails sent from a work email address.

There will be an additional \$25.00 charge for any returned transactions.

Ragan Ellis

Toll Free: 877-427-6544 ext. 5252 followed by the *

As of the date of this letter, you owe \$20110.44. Because of interest, late charges and other charges that may vary from day to day, the amount due on the day you pay may be greater.

This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.

PLEASE RETURN THIS PORTION WITH YOUR REMITTANCE

TBL# Tara Bowman

Best Number For Contact: _____ Home _____ Cell

You may contact me by telephone and leave voicemail messages. ___Yes ___No

Ex. 3 - Page 1 of 1

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
 Tara Bowman

(b) County of Residence of First Listed Plaintiff Washington
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
 Michael Fuller, US Bancorp Tower, 111 SW 5th Ave., Suite 3150
 Portland, Oregon 97204, 503-201-4570

DEFENDANTS
 Todd, Bremer & Lawson, Inc.

County of Residence of First Listed Defendant _____
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
		IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	
			FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding

2 Removed from State Court

3 Remanded from Appellate Court

4 Reinstated or Reopened

5 Transferred from another district (specify)

6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
15 U.S.C. § 1692k

Brief description of cause:
FDCPA Violation

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ _____

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE: 07/14/2017

SIGNATURE OF ATTORNEY OF RECORD: s/ Michael Fuller

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Oregon

TARA BOWMAN

Plaintiff

v.

TODD, BREMER & LAWSON, INC.

Defendant

Civil Action No. 3:17-cv-1092

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Todd, Bremer & Lawson, Inc.
c/o registered agent Cogency Global, Inc.
325 13th Street NE, Suite 404
Salem, Oregon 97301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Tara Bowman
c/o attorney Michael Fuller
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk